

# **Field Office 10 CFR 851 Implementation Workshop**

## **Occupational Medicine Program**

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**SIXTY YEARS  
OF DISCOVERY  
1947-2007**

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**BROOKHAVEN**  
NATIONAL LABORATORY



# Occupational Medicine Program

- BNL's Occupational Medicine Program for employees complies with the requirements stated in 10 CFR 851.
- Requirements of the Occ Med Program are flowed down to subcontractors based on:
  - Lack of resources to provide Occ Med services to third parties;
  - Concerns regarding possible third party liability;
  - Issues with maintaining non-employee medical records.

# Occupational Medicine Program

- Subcontractors
  - must submit Health & Safety Plans that are compliant with 10 CFR 851 requirements, including the Occ Med Program;
  - meet applicable OSHA medical surveillance requirements for specific hazards such as asbestos, lead, etc.; and
- All subcontractors are working towards implementing a full Occ Med Program
  - To date, five subcontractors have submitted Occ Med Program Descriptions and BNL has approved them
  - Two more are pending

# Roll-out to Contractors

- Held workshops with subcontractors
- Commitment to compensate subcontractors with contracts currently in place
- Provided list of local occupational medicine physicians
- Provided sample Occ Med Program description and Job Assessment Forms to submit to physician.

# Subcontractor Concerns

- 1) What happens if the Occ Med doctor finds one of our union employees not fit for work?
- 2) How will I know if a worker has been at BNL for 30 days in a 12-month period?
- 3) Can I recall a previously 'certified' worker from the union hall?
- 4) What about ongoing costs?

# Subcontractor Concerns...

- BNL plans to meet with local union presidents to
  - discuss 10 CFR 851 requirements and subcontractors' concerns, and
  - listen to their concerns.

# Questions?